

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LEMUEL BLAND, *et al.*, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

PNC BANK, N.A.,

Defendant.

No. 2:15-cv-01042-AJS

LEAD CASE

MARAT GOKHBERG, *et al.*

Plaintiffs,

v.

THE PNC FINANCIAL SERVICES GROUP,
INC., *et al.*,

Defendant.

No. 2:15-cv-01700-AJS

MEMBER CASE

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
COLLECTIVE AND CLASS ACTION SETTLEMENT AND RELATED RELIEF**

Plaintiffs, by and through undersigned counsel, hereby seek an Order:

1. Granting final approval to the FLSA Collective Action and Rule 23 Class Action Settlement, filed with this Court at ECF Doc. No. 351-1, and ordering that all class members are subject to the release of claims set forth therein;

2. Ordering Defendant, pursuant to the Settlement Agreement, to wire \$16,000,000 (Sixteen Million Dollars) plus Employer Payroll Taxes to the Claims Administrator no later than 30 days from the date of the Final Approval Order;

3. Ordering the Claims Administrator to distribute the Settlement Fund to all class members consistent with the Settlement Agreement, including the Service Awards contemplated for the Class Representatives;
4. Granting Class Counsel's request for reasonable attorneys' fees for \$5,333,333 which shall be distributed to all Class Counsel Firms per their agreement;
5. Granting Class Counsel's request for reimbursement for its out-of-pocket litigation costs, totaling \$199,055.97;
6. Granting the Claims Administrator its reasonable fees and costs incurred in administering the settlement; and
7. Dismissing this matter with prejudice without costs or fees to either side, except as provided in the Settlement Agreement and the Court's Order.

Respectfully Submitted,

/s/Justin L. Swidler

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